

As a professional broadcaster for more than 30 years and a radio listener and TV viewer, I am aware of the increase in programming that may be considered objectionable to many people. Much of what I see and hear today pushes the envelope of good taste, if not the legal definition of what may be broadcast over the air. If I don't like the content of a certain program or station, regardless of the reason, I simply don't listen. I'm not a prude by any means, but I feel that some material I see and hear is not what I expect or want from a broadcaster using federally-licensed RF spectrum. It doesn't meet the legal definition of obscenity, but it's still objectionable to me.

I feel the requirement for broadcasters to record programming and retain it is an unnecessary expense. As Chief Engineer for a group of 6 radio stations, my preliminary checking on the initial cost to set up an automatic recording system to meet the proposed requirements would be in the neighborhood of \$5 to \$10,000, not counting staff time for installation, monitoring and maintenance. I also suspect that, if a station is ever required to produce a recording, it may not be available. Our on-air computer system is very reliable, but it still has problems from time to time. For example, we automatically record a number of programs for later playback. Everything may work as programmed for several months. Then, one time, for no apparent reason, it doesn't record a program. This isn't discovered until the program is due to air and doesn't (or it's the previous day's show). Without someone keeping a close eye on the proposed recordings, there will be problems that go undiscovered until they're needed. Ideally, we would assign a staff member or hire someone to do at least a random check to be sure the recordings were actually being made. This is another additional financial burden on broadcasters who do everything they can to abide by the rules. In addition, if a station is required to produce a recording of material they know will result in a fine or loss of license, I suspect some may claim a technical problem. (ie: 18 missing minutes from a Nixon tape)

The real problem with objectional material being broadcast is not with someone who accidentally says something when they thought the mike was off or the newscaster who slips and says a bad word. It lies with a few "bad apples", like Howard Stern and other purveyors of raunchy radio, who cater to what their audience apparently wants. If the market isn't there and the networks and stations lose money, those types of programs will be gone. If these people go too far and break the law, levying fines seems to work pretty well. My point here is that these types of shows do pretty much the same thing every day. If you thought Stern was objectionable Monday, you could tune in Friday and hear pretty much the same trash. It's not necessary to have the Monday recording. If the FCC receives several complaints about a certain station or show, it should monitor it and make a determination. However the complaints need to be properly evaluated first.

A talk show host on one of our stations did an excellent program on the problem of breast cancer. At the beginning of the show, he used several slang terms for breasts, the worst being "boobs". We got complaints about him. This type of thing is certainly not in the same league as those who regularly delve into sexual innuendo and potty humor.

In summary, I feel the proposal is an unnecessary financial burden and is unworkable. There are already ways to deal with this problem.

Thanks for listening.

Jim Bremer